

UNITED STATES OF AMERICA  
Before the  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

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Docket No. R2000-1

REQUEST OF THE OFFICE OF THE CONSUMER ADVOCATE  
TO CONDUCT ORAL CROSS-EXAMINATION OF POSTAL SERVICE  
WITNESS DAVID R. FRONK CONCERNING HIS  
RESPONSE TO NOTICE OF INQUIRY NO. 3  
AND NOTICE OF INTENT TO SUBMIT REBUTTAL EVIDENCE  
(July 18, 2000)

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On June 30, 2000, the Commission issued Notice of Inquiry (NOI) No. 3. In that NOI, the Commission sought comments from the participants concerning a change in volume forecasts for First Class additional ounces. The change first appeared in revisions to the workpapers of Postal Service witness Fronk, filed April 17, 2000. The effect of the change is a reduction in the net revenue of single piece First Class Mail of \$172.2 million.

On July 17, 2000, the Postal Service submitted testimony of witness Fronk purporting to justify the April 17 change in additional ounce forecasting methodology.<sup>1</sup> That testimony is scheduled to be received at a hearing on July 21. The Office of

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<sup>1</sup> The OCA notes that the Postal Service filing was titled a response rather than being designated supplemental testimony. It is, however, the statement of witness Fronk and is accompanied by a declaration. It is evident that the Postal Service intends Mr. Fronk's response to be entered into evidence. As such, it should be subject to cross-examination as contemplated at page 5 of NOI No. 3.

Consumer Advocate (OCA) requests the opportunity to cross-examine witness Fronk concerning his response to NOI No. 3.

The OCA also serves notice that it intends to submit rebuttal testimony concerning witness Fronk's response to NOI No. 3 on August 14, 2000, the date set for submission of other rebuttal testimony.

Respectfully submitted,



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Director

Office of the Consumer Advocate


EMMETT RAND COSTICH

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#### CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

  
Stephanie S. Wallace

Washington, DC 20268-0001  
July 18, 2000